

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

(1)	JOSHUA FIELDS)	
)	
	Plaintiff,)	
)	
v.)	Case No. CIV-21-986-G
)	
(1)	GREAT LAKES INSURANCE SE,)	Removed from the District Court of
(2)	MJ KELLY COMPANY, and)	Kay County, State of Oklahoma
(3)	CAPSTONE ISG,)	Case No. CJ-2021-00037
)	
	Defendants.)	

PLAINTIFF'S UNOPPOSED MOTION TO FILE RESPONSES OUT OF TIME

COMES NOW Plaintiff Josh Fields and respectfully moves this Court for an Order allowing him to file responses out of time to Defendant Great Lakes Insurance SE's Motions to Exclude Expert Testimony of Dereck Cassady and Russ Didlake [Doc. #39] and Motion for Summary Judgment [Doc. #40]. In support of this motion, Plaintiff states as follows:

1. Defendant's Motion to Exclude Expert Testimony of Dereck Cassidy and Russ Didlake [Doc. #39] and Motion for Summary Judgment [Doc. #40] were filed with this Court on September 1, 2022.
2. Pursuant to LCvR7.1(g), Plaintiff had 21 days from the filing of those motions, or September 22, 2022, to file his responses.
3. On September 20, 2022, Plaintiff filed an Unopposed Motion for Extension of Time to File Responses [Doc. #41] requesting an extension to October 3, 2022, to file responses to Defendant's pending motions.
4. The motion for extension of time was not ruled on prior to original filing deadline of September 22, 2022, and remains pending before the Court.

5. Plaintiff has conferred with Defendant's counsel about this request to file his responses out of time and Defendant does not oppose the request.

6. The only prior request for additional time to file Plaintiff's responses was the pending Unopposed Motion for Extension of Time to File Responses [Doc. #41].

7. Allowing Plaintiff to file his responses out of time will not impact the scheduled trial or other deadlines set in this case.

For these reasons, Plaintiff respectfully requests this Court enter an Order allowing Plaintiff to respond to Defendant's Motions to Exclude Expert Testimony of Dereck Cassady and Russ Didlake [Doc. 39] and Motion for Summary Judgment [Doc. 40] out of time by filing his responses on or before October 7, 2022.

Respectfully submitted,

MARTIN JEAN & JACKSON

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CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of October 2022, I electronically transmitted the attached document to the Clerk of the Court using the ECF System for filing. Based on the records currently on file, the Clerk of the Court will transmit a Notice of Electronic Filing to the following ECF registrants, via email:

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